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Michael Richard Lynch*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendants.

Case No.: 3:18-cr-00577-CRB
Judge: Hon. Charles Breyer

**DECLARATION OF CELESTE L.M.
KOELEVLD IN SUPPORT OF
DEFENDANT MICHAEL RICHARD
LYNCH'S OPPOSITION TO THE
GOVERNMENT'S MOTION *IN LIMINE* TO
ADMIT SETTLEMENT AGREEMENT
WITH BRENT HOGENSON**

Court: Courtroom 6 – 17th Floor
Date Filed: March 31, 2024
Trial Date: March 18, 2024

DECLARATION OF CELESTE L.M. KOELEVeld

I, Celeste L.M. Koeleveld, declare as follows:

1. I am an attorney licensed to practice law in New York and a partner at the law firm of Clifford Chance US LLP, counsel for the defendant Michael Richard Lynch.

2. I have knowledge of the facts set forth herein, and if called upon as a witness to testify thereto, I could do so competently under oath.

3. Attached hereto as Exhibit 1 is a true and correct copy of an email from Andrew Kanter to Jaideep Venkatesan and others, dated October 26, 2010 (Trial Exhibit 7994).

4. Attached hereto as Exhibit 2 is a true and correct copy of Robert Webb's Witness Statement from the UK civil proceedings, dated November 1, 2018.

5. Attached hereto as Exhibit 3 is a true and correct copy of a settlement agreement between Hewlett Packard and Marcela Perez de Alonso, dated March 22, 2011.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed March 31, 2024, in San Francisco, California.

/s/ Celeste L.M. Koeleveld
Celeste L.M. Koeleveld